

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
v.)	Civil Action No. 05-11598 WGY
)	<u>THREE-JUDGE COURT</u>
CITY OF BOSTON,)	
MASSACHUSETTS, et al.,)	
)	
Defendants.)	
)	

**UNITED STATES' RESPONSE TO SECRETARY OF
COMMONWEALTH'S AUGUST 24, 2007 REPORT TO THE COURT**

Though the Court has denied the United States motion for clarification, the Secretary of the Commonwealth (“Secretary”) continues to file reports with the Court regarding the instant case. In these reports, the Secretary raises factual disputes between the parties with regard to the violations of the voting rights of Chinese-speaking citizens and claims that the United States has made “serious distortions” to the Court regarding such. See Docket #109, Secretary’s Report to the Court at 2, n.2. The United States does not wish to belabor the issue. Instead, the United States simply submits that the witness declarations, federal observer reports, and other pleadings contained in the record speak for themselves with regard to the barriers that Chinese-speaking voters must overcome in order to vote and which are directly related to their membership in a language minority group,

Respectfully submitted,

RENA J. COMISAC
Acting Assistant Attorney General
Civil Rights Division

/s/ T. Russell Nobile

JOHN TANNER
SUSANA LORENZO-GIGUERE
VERONICA SEUNGWON JUNG
T. RUSSELL NOBILE
JARED M. SLADE
T.Russell.Nobile@usdoj.gov
Attorneys, Voting Section
Civil Rights Division
United States Department of Justice
Room 7247 NWB
950 Pennsylvania Avenue, N.W.
Washington, DC 20530
(202) 307-1190 (phone)
(202) 307-3961 (fax)

Date: September 12, 2007

CERTIFICATE OF SERVICE

I, T. Russell Nobile, hereby certify that the foregoing document and proposed order filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on September 12, 2007.

/s/ T. Russell Nobile _____
T. Russell Nobile
Trial Attorney, Voting Section
United States Department of Justice